

EXHIBIT 1

From: Monica McCarroll <MMcCarroll@redgravellp.com>
Sent: Tuesday, November 26, 2019 3:29 PM
To: James Chapman; W. Ryan Snow; Darius Davenport; Hugh Fain; Connell Mullins; Spivey, W. Edgar; John Erbach; Belote, Clark J.; Peterson, Ashley P.; Noonan, Jeanne E.; McFarland, Robert W.; Evans, Jason D.; Hatch, Benjamin L; Kynes, Cameron G.; Justus, J. Brent; David Hartnett
Cc: Wingfield, Alan D.; Lacy, Michael E.; Flowers, Elizabeth Spain
Subject: CSXT v. NSR et al. - NSR Search Terms [IWOV-Active.FID39729]
Attachments: NSR Search Terms (20191126).PDF

Counsel,

Per our discussion during the meet and confer last Wednesday, I am attaching NSR's first set of search terms. Please note that these initial terms are targeted at only some of the discovery requests issued by CSXT to date. NSR continues to refine additional terms targeted at other discovery requests issued by CSXT, and will share those additional search terms when they are ready. Please advise if you have any comments or concerns about NSR's first set of search terms, or would like to schedule a meet and confer to discuss further.

Regards,

MONICA McCARROLL

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CSXT v. NSR et al.
No. 2:18-cv-00530-MSD
NSR Search Terms
November 26, 2019

1. (beltline OR NPBL OR “belt line”) AND NOT Chicago
2. (“Virginia International Terminal*” OR “Virginia Port Authority” OR VIT OR VPA OR “*virginia.gov”) AND (CSX* OR (switch w/5 (fee* or rate*)))
3. CSX* w/50 ((2010 OR 2018) w/10 rate*)
4. (beltline OR NPBL OR “belt line”) AND (diamond OR ((milepost or “mile post”) w/10 (“1.40” OR “2.30”)))
5. (beltline OR NPBL OR “belt line”) w/20 audit*
6. (beltline OR NPBL OR “belt line”) AND (“*csx.com” OR CSX*)
7. (beltline OR NPBL OR “belt line”) AND (STB OR “Surface Transportation Board” OR (surface w/5 board))
8. (beltline OR NPBL OR “belt line” OR CSX*) w/50 (“Norfolk International Terminal” OR “Portsmouth Marine Terminal” OR “Virginia International Gateway” OR “Virginia International Terminal*” OR “Virginia Port Authority” OR NIT OR PMT OR VIT OR VPA)
9. “*gwrr.com” AND (switch w/5 (fee* OR rate*))